

SABIN METAL CORPORATION

1647 WHEATLAND CENTER ROAD • SCOTTSVILLE, NEW YORK 14546

REFINERS OF PRECIOUS METALS
GOLD • SILVER • PLATINUM • PALLADIUM • RHODIUM

(585) 538-2194
FAX# 585-538-2593

February 7, 2013

Robert G. Heiss, Director
International Compliance Assurance Division
US Environmental Protection Agency
Ariel Rios Building
Room 6144
1200 Pennsylvania Avenue, NW
Washington, D.C. 20004

Re: Annual Report 2012

Dear Mr. Heiss:

Enclosed please find a report that contains the information required by 40 CFR 262.56 and 262.87(a).

I believe that you have all of the information you require. However, if you have any questions over this submission, do not hesitate to contact me.

Sincerely,

Michael S. Hubbard, CIH
Senior Environmental Engineer

Enc.

received
SOV 2/19/2013

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EPA Annual Report for Exported Hazardous Waste – Calendar Year 2012

Exporter:

Sabin Metal Corporation	EPA ID# NYD-067919340	
1647 Wheatland Center Rd.		
Scottsville	NY	14546-0905

Consignee:

SMC (Canada), Ltd.		
McAlpine Site/ Coleman Township		
Cobalt	ON	P0J 1C0

Transporter:

Peter Hodge Transportation, Ltd.		
100 Market Drive		
Milton	ON	L9T 3H5

Hazardous Waste Export Description:

Common Description: Bricks and other refractory materials removed from ductwork, stacks and a thermal reduction furnace as a result of infrequent maintenance activities.

Hazardous Waste Numbers: D006, D007, D008

DOT hazard class: Environmentally Hazard Substance, Solid, n.o.s.,
(Lead)(Cadmium)(Chromium), 9, UN3077, PG III

Quantities Shipped:

<i>Weight Shipped:</i> 343,385 lb	<i>Number of Shipments:</i> six (6)
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Comparison of Changes in Annual Volumes of Waste:

Sabin does not have a hazardous waste stream that is generated and shipped continuously.
Sabin became a large quantity generator of hazardous waste in the year 2003 when it sent 4191 lb of silver/mercury batteries to a mercury reclaimer for mercury removal/recovery. In 2004, no hazardous waste was generated by Sabin. In 2005, about 10,050 lb of a wastewater, which had a residue of F006, F007 and F008 mixed with it, was disposed of at Vickery Environmental in Ohio. It was generated as a result of an operator error where filtrates from gold plating bath solutions (listed wastes) were accidentally

mixed with non-hazardous waste water. The following year, 2006, Sabin's water evaporation system was dismantled for repairs, so plating bath solutions were disposed of rather than evaporated. That resulted in 120,112 lb of hazardous waste water being generated. Around 3232 lb of mercury was also sent to a mercury reclaimer that year - the silver bearing residue was returned to Sabin for precious metals reclamation. In 2007, about 39,537 lb of hazardous waste water was sent for disposal, 2455 lb of mercury sent for reclamation and 437,945 lb of waste brick was generated from furnace/stack/ductwork maintenance activities. In 2008, 159,665 lb of brick from a stack demolition was generated. In 2009, about 3000 lb of mercury containing batteries were sent to a mercury reclaimer - the silver bearing residue was returned to Sabin for precious metals reclamation. In 2010 and 2011, no hazardous waste was generated.


Description of Efforts to Reduce Volume and Toxicity of Waste:

Education was provided to the operators of the water recovery process so as to prevent the mixing of listed waste residues with the non-hazardous waste water. That has not occurred since, so it could be said that Sabin's waste reduction effort (education) has resulted in 10,000 lbs less of hazardous waste being generated every year. The evaporation system was rebuilt in 2007, so Sabin will not be disposing of plating bath waste water, as it did in 2006 and early 2007, unless there is a problem with the evaporation system that cannot be foreseen. Re-installing the evaporation has, therefore, eliminated the production of 120,000 lb or more of hazardous waste per year. The hazardous waste exported in 2007, 2008 and 2012 was brick from large thermal reduction furnaces and their associated stack and lined ductwork. For two systems, it was removed during maintenance activities that occur approximately every 15 to 20 years on that particular unit. The furnace system dismantled in 2012 will not be re-installed, so the generation of waste from it will never occur again. The source of the environmental hazard for furnace systems is the burning of customer electronic scrap materials and the evaporation of filtrates from plating bath solutions that contain gold. The only way to eliminate or reduce the hazard would be to not process customer materials containing lead and cadmium or to no longer accept their gold plating baths. That would entail reducing Sabin's business activity dramatically and would, therefore, be economically infeasible.

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EPA Annual Report of Exported Hazardous Waste

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signature:  Date: 2/7/2013

Name: James A. Barrett

Title: General Manager


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SABIN METAL CORPORATION
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Scott